

Received

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
-v -	:	
	:	
JOSUE GUTIERREZ MENDEZ,	:	
OSWALDO ANAYA MORENO,	:	NO.: 07 CRIM 533
a/k/a "Carlos,"	:	
a/k/a "Luis,"	:	
a/k/a "Loco,"	:	
a/k/a "Buyi,"	:	
a/k/a "Bullie,"	:	
EDISON DE LOS SANTOS,	:	
a/k/a "Pancho,"	:	
a/k/a Eddie," and	:	
RICARDO DELUCAS SORIANO,	:	
a/k/a "Primo,"	:	

-----X

**DOUGLAS P. EARL, ESQUIRE'S UNOPPOSED PRO HAC VICE
TO REPRESENT JOSUE GUTIERREZ MENDEZ**

William McCulloh, Esquire moves this court for an order permitting Douglas P. Earl, Esquire represent Josue Gutierrez Mendez, defendant in this case, and in support of this motion, Douglas P. Earl, states as follows:

1. William McCulloh, Esquire is a member of the Bar of the U.S. District Court for the Southern District of New York.
2. Douglas P. Earl, Esquire is a member of good standing of the bars of the following courts:

The Supreme Court of Pennsylvania

United States District Court for the Eastern District of Pennsylvania.

Attached as Exhibit "A" is a copy of a Certificate of Good Standing from the United States Eastern District of Pennsylvania. Attached as Exhibit "B" is a Certificate of Good Standing from the Supreme Court of Pennsylvania.

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[Faint circular stamp]

3. Douglas P. Earl, Esquire is familiar with the Federal Rules of Criminal Procedure and the local rules of this court. He will faithfully abide by the rules of this court.

4. He is of high moral character.

WHEREFORE, William McCulloh, Esquire moves this court for an order permitting Douglas P. Earl, Esquire represent Josue Gutierrez Mendez, defendant in this case.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Will McCulloh", is written over a horizontal line.

William McCulloh, Esquire
868 Little East Neck Road
West Babylon, N.Y. 11174
(631) 422-1500
(631) 422-1559

**UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

X

Plaintiff,

-v-

NO.: 07 CRIM 533

JOSUE GUTIERREZ MENDEZ,
OSWALDO ANAYA MORENO,
a/k/a "Carlos,"
a/k/a "Luis,"
a/k/a "Loco,"
a/k/a "Buyi,"
a/k/a "Bullie,"
EDISON DE LOS SANTOS
a/k/a "Pancho,"
a/k/a "Eddie," and
RICARDO DELUCAS SORIANO,
a/k/a "Primo,"

**AFFIDAVIT OF
WILLIAM C. MCCULLOH
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Defendant.

X

State of New York)
)
County of Suffolk)

ss:

Bill McCulloh, Being duly sworn, hereby deposes and says as follows:

1. I am a partner in the law firm of McCulloh & Weiss, LLC. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Douglas P. Earl as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 10, 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Douglas P. Earl since late 2006.

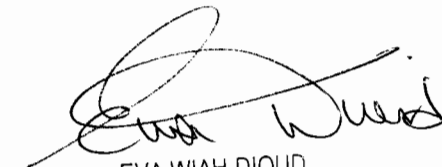
4. Mr. Earl is a sole practitioner in Philadelphia, Pennsylvania.
5. I have found Mr. Earl to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Douglas P. Earl, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Douglas P. Earl, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Douglas P. Earl, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: 9/5/07

City/State: West Babylon, New York

Notarized:


EVA WIAH-DIOUD
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN SUFFOLK COUNTY
NO. #01WI6133970
MY COMM. EXPIRES SEPT. 19, 20 09

Respectfully Submitted,



William C. McCulloh

SDNY Bar Code: WCM 4124

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }.

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Douglas P. Earl, Bar #54808 was duly admitted to practice in said Court on June 18, 1991, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ
Clerk of Court

on August 16, 2007

BY *in Jeffers*
Sheila M. Jeffers
Deputy Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Douglas Earl, Esq.

DATE OF ADMISSION

May 17, 1989

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 16, 2007

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'P'.

John W. Person, Jr., Esq.
Deputy Prothonotary

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JOSUE GUTIERREZ MENDEZ,	:	
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a/k/a "Bullie,"	:	
EDISON DE LOS SANTOS,	:	
a/k/a/ "Pancho,"	:	
a/k/a Eddie," and	:	
RICARDO DELUCAS SORIANO,	:	
a/k/a "Primo,"	:	
-----X		

ORDER

AND NOW, this day of , 2007, upon consideration of the Defendant's Unopposed Motion for Admittance Pro Hac Vice and the Government having no opposition thereto, it is **ORDERED** that the motion is **GRANTED**. DOUGLAS P. EARL, ESQUIRE is admitted Pro Hac Vice to represent JOSUE GUTIERREZ MENDEZ.

BY THE COURT:

THE HONORABLE DEBORAH A. BATTS
United States District Court Judge


CERTIFICATE OF SERVICE

Assistant Federal Defender, Federal Community Office for the Eastern District of Pennsylvania, hereby certify that I have served a copy of Defendant's Unopposed Motion for Admittance Pro Hac Vice:

Honorable Deborah A. Batts
United States District Court
Southern District of NY
500 Pearl Street, Room 2510
New York, NY 10007

Eugene Ingoglia, Esq.
US Attorney's Office
1 St. Andrews Plaza
New York, NY 10007

Date 9/05/07



William McCulloh, Esquire